

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

CHOON'S DESIGN INC.,
a Michigan corporation,

Plaintiff

Case No. 2:13-cv-13568-LJM-RSW

v.

Hon. Laurie J. Michelson

ZENACON, LLC,
a Florida limited liability company,
STEVEN VERONA, an individual,
GEEKY BABY, LLC, a Florida limited
liability company, and
IDEAVILLAGE PRODUCTS CORP., a New
Jersey corporation

Defendants

ZENACON, LLC,
a Florida limited liability company,

Third Party Plaintiff

v.

CHEONG CHOON NG, an individual,

Third Party Defendant.

**NOTICE OF FILING UNDER SEAL:
PLAINTIFF CHOON'S DESIGN, LLC'S OPENING CLAIM
CONSTRUCTION BRIEF AND EXHIBITS 2 & 3 THERETO**

Pursuant to E.D. Mich. L.R. 5.3(A), Plaintiff Choon's Design, LLC
("Plaintiff" or "Choon's") hereby provides notice that it will be filing its Opening

Claim Construction Brief (the “Brief”) under seal, as well as Exhibits 2 and 3 thereto.

Pursuant to E.D. Mich. L.R. 26, Choon’s must file these documents under seal pursuant the terms of the Protective Order agreed to by the parties and entered by the Court (*See* Doc. # 85).

Exhibit 2 is excerpts of a transcript of the deposition of Lori Ann Lombardo, acting as a representative of Idea Village Products Corp. (“Defendant” or “Idea Village”). The relevant portions referenced in the Brief contain quotations and references to an exhibit that is designated by Defendant as “Highly Confidential Information Attorney’s Eyes Only” and therefore falls under the Protective Order and cannot be made public per E.D. Mich. L.R. 26.4.

Exhibit 3 is an exhibit from the deposition of Lori Ann Lombardo that is designated by Defendant as “Highly Confidential Information Attorney’s Eyes Only” and therefore falls under the Protective Order and cannot be made public per E.D. Mich. L.R. 26.4.

The Brief is being filed under seal as it contains references to the contents of the above-described exhibits which fall under the Protective Order and are being filed under seal under E.D. Mich. L.R. 26.4.

Dated: July 6, 2015

CARLSON, GASKEY & OLDS, P.C.

/s/ Brian S. Tobin

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CERTIFICATE OF SERVICE

I certify that on July 6, 2015, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

CARLSON, GASKEY & OLDS, P.C.

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